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7 8		Counsel for Fiat Chrysler Automobiles N.V., FCA US LLC, Sergio Marchionne, V.M. Motori, S.p.A. and V.M. North America, Inc.
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11 12		Washington, DC 20006 Telephone: (202) 974-1500 Facsimile: (202) 974-1999 Email: mslater@cgsh.com
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14		Counsel for Robert Bosch LLC and Robert Bosch GmbH
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16		EC DICTRICT COURT
17		ES DISTRICT COURT
18		TRICT OF CALIFORNIA
19	SAN FRAN	ICISCO DIVISION
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21	IN RE CHRYSLER-DODGE-JEEP ECODIESEL MARKETING, SALES	Case No. 3:17-md-02777-EMC order - pretrial order no. 19
22	PRACTICES, AND PRODUCTS LIABILITY LITIGATION	AGREED STIPULATION AND [PROPOSED] ORDER AMENDING
23		CERTAIN DEADLINES
24		The Honorable Edward M. Chen
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WHEREAS, on March 15, 2018, the Court granted in part and denied in part indants' motions to dismiss the Class Plaintiffs' Amended Consolidated Consumer Class on Complaint, and granted leave to amend certain of their claims (ECF No. 290);

WHEREAS, the Class Plaintiffs intend to amend certain of their claims, and endants may move to dismiss some or all of the claims;

WHEREAS, Class Plaintiffs and Defendants previously raised a dispute in the 1 3, 2018 Joint Case Management Conference Statement (ECF No. 292) concerning the duling of class certification depositions, the schedule for class certification briefing, and s Plaintiffs' request to bifurcate class certification briefing;

WHEREAS, the Parties have met and conferred and resolved the dispute in an upt to avoid any undue delay in these proceedings, such that, subject to Court approval, Class tiffs will file their amended complaint and then move for class certification on all claims ted in the amended complaint during the pendency of Defendants' anticipated motion to iss claims in the amended complaint; and

WHEREAS, the agreed-upon schedule sets forth a briefing schedule for ndants' motion to dismiss Class Plaintiffs' amended complaint and a revised schedule for ing class certification of all claims.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and ng the Parties, and subject to the approval of the Court:

The following deadlines are hereby established regarding the Class Plaintiffs' nded complaint and Defendants' anticipated motion to dismiss:

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22	Date	Event	
23	April 23, 2018	The Class Plaintiffs shall file the Second Amended Consolidated	
		Consumer Class Action Complaint ("SAC").	
24	May 23, 2018	Defendants shall answer, move to dismiss, or otherwise respond to the	
25		SAC.	
23	June 22, 2018	Plaintiffs shall file any response in opposition to any motion to dismiss	
26		made by Defendants.	
	July 13, 2018	Defendants will file any reply(ies) in support of their motions to dismiss.	
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Class Plaintiffs shall move for class certification of all claims in the SAC, and the following deadlines are hereby revised in that regard:

Prior Deadline	New Deadline	Event
April 16, 2018	June 6, 2018	Class Plaintiffs shall file their motion for class
		certification of all claims in the SAC. All
		remaining class-certification depositions of
		Defendants will be completed sufficiently in
		advance of this deadline.
May 14, 2018	June 22, 2018	Defendants shall disclose experts on which they
		shall rely for their opposition to the class
		certification motion.
May 29, 2018	July 23, 2018	Defendants shall file their brief(s) in opposition
		to the Class Plaintiffs' motion for class
		certification. All remaining class-certification
		depositions of Class Representatives will be
		completed sufficiently in advance of this
		deadline.
June 25, 2018	August 20, 2018	Class Plaintiffs shall file a reply brief in support
		of their motion for class certification.

Sept. 17, 2018(2:15 p.m.)-Hearing on motion for class certification

SO STIPULATED.

Dated: April 7, 2018 Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Elizabeth J. Cabraser Elizabeth J. Cabraser

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Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering Committee

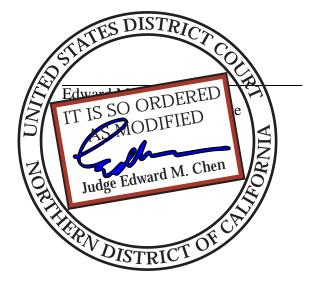
1	Dated: April 7, 2018	SULLIVAN & CROMWELL LLP
2		By: /s/ Robert J. Giuffra, Jr. Robert J. Giuffra, Jr.
3		Robert J. Giuffra, Jr.
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9		Counsel for Fiat Chrysler Automobiles N.V., FCA US LLC,
10		Sergio Marchionne, V.M. Motori, S.p.A., and V.M. North America, Inc.
11	Dated: April 7, 2018	CLEARY GOTTLIEB STEEN & HAMILTON LLP
12	,,	
13		By: /s/ Matthew D. Slater Matthew D. Slater
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[PROPOSED] ORDER AMENDING CERTAIN DEADLINES

Based on the foregoing Stipulation, the Court GRANTS the Parties' Agreed Stipulation

Amending Certain Deadlines.

IT IS SO ORDERED.



ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3)) In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories. Dated: April 7, 2018 /s/ Elizabeth J. Cabraser Elizabeth J. Cabraser

1	CERTIFICATE OF SERVICE
2	I HEREBY CERTIFY that on April 7, 2018, a true and correct copy of the foregoing was
3	electronically filed and served electronically via the Court's CM/ECF system, which will
4	automatically serve notice to all registered counsel of record.
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6	<u>/s/ Elizabeth J. Cabraser</u> Elizabeth J. Cabraser
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